

MARK E. FELGER (MF9985)
JERROLD N. POSLUSNY, JR. (JP7140)
COZEN O'CONNOR
LibertyView, Suite 300
457 Haddonfield Road
Cherry Hill, NJ 08002
(856) 910-5000
(856) 910-5075 (fax)

Attorneys for the Debtors

In re:	:	UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF NEW JERSEY
SHAPES/ARCH HOLDINGS L.L.C., <u>et</u> <u>al.</u> ,	:	CHAPTER 11
Debtors.	:	CASE NO. 08-14631 (GMB) (Jointly Administered)
	:	

**APPLICATION FOR ORDER SHORTENING TIME PERIOD FOR NOTICE OF
DEBTORS' VERIFIED MOTION PURSUANT TO 11 U.S.C. §§ 105(a), 1123 AND 1129
AND BANKRUPTCY RULE 2002 FOR AN ORDER APPROVING: (A) THE
COMPETITIVE PROCESS FOR THE SALE OF THE REORGANIZED DEBTORS'
EQUITY PURSUANT TO THE DEBTORS' SECOND AMENDED PLAN OF
REORGANIZATION AND (B) APPROVING A BREAK-UP FEE
AND EXPENSE REIMBURSEMENT**

TO: THE HONORABLE GLORIA M. BURNS

Your applicant, Jerrold N. Poslusny, Jr., respectfully represents:

1. Your applicant is a member with the firm of Cozen O'Connor, attorneys for the above captioned debtors and debtors-in-possession (the "Debtors").¹ I am familiar with the facts of this case.

2. Your applicant has filed a motion for an order approving: (a) the Competitive Process for the sale of the reorganized Debtors' equity under the terms and conditions of the

¹ Unless otherwise defined herein, all capitalized terms shall have the meanings ascribed to them in the Motion.

Debtors' Second Amended Plan of Reorganization; and (b) approving a Break-Up Fee and an Expense Reimbursement (the "Motion").

3. A shortened hearing date is requested as the parties agreed, at the May 1, 2008 hearing, to the process for the sale of the Debtors' equity to Arch Acquisition I, LLC ("Arch").

As discussed in the Motion, qualified bids must be received no later than June 25, 2008.

Shortened notice is requested in order to provide as much time as possible to market the Debtors and to provide potential bidders with sufficient time to complete due diligence.

4. Your Applicant requests a hearing be scheduled on May 19, 2008, at 2:00 p.m.

5. Reduction of the time period in question is not prohibited under Fed. R. Bankr. P. 9006(c)(1) and the Rules listed therein.

WHEREFORE, your applicant requests entry of the Order submitted herewith.

Dated: May 12, 2008

COZEN O'CONNOR

By: /s/ Jerrold N. Poslusny, Jr.

Mark E. Felger

Jerrold N. Poslusny, Jr.

Attorneys for the Debtors